

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CALEB MICHAEL DUDLEY,

Plaintiff,

Civil Action No. 3:25-cv-13

v.

STEPHANIE MORTON, *et al.*

Defendants.

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO DEFENDANT MORTON'S MOTION TO DISMISS**

On January 10, 2025, Plaintiff Caleb Dudley filed his Complaint. ECF 1. Defendant Morton was served on January 24. After a few extensions were granted by this Court, Defendant Morton filed a Motion to Dismiss and accompanying Memorandum in Support on March 1. ECF 12 and 13. A response would currently be required by March 28. Plaintiff's counsel is currently preparing for a trial in the Western District of Virginia and has asked counsel for Defendant Morton for an additional 10 days to respond to the Motion to Dismiss, which would make his response due on April 7. Defendant Morton's counsel has agreed.

Plaintiff respectfully requests this Court extend his deadline to respond to Defendant Morton's Motion to Dismiss by ten days and make his response due on Monday, April 7, 2025 and order any other relief this Court finds just and necessary.

Respectfully submitted,

CALEB MICHAEL DUDLEY,

By: /s/ Danny Zemel
Counsel

Danny Zemel (VSB# 95073)
THE KRUDYS LAW FIRM, PLC
919 E. Main Street, Suite 2020
Richmond, VA 23219
Phone: (804) 774-7950
Fax: (804) 381-4458
Email: dzemel@krudys.com
Counsel for Plaintiff

Certificate of Service

I hereby certify that on this 17th day of March 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send notification of such filing to all counsel of record.

By: /s/ Danny Zemel
Counsel

Danny Zemel (VSB# 95073)
THE KRUDYS LAW FIRM, PLC
Truist Place
919 E. Main Street, Suite 2020
Richmond, VA 23219
Phone: (804) 774-7950
Fax: (804) 381-4458
Email: dzemel@krudys.com
Counsel for Plaintiff